



June 21, 2005

Comment 107

Chief, Regulations and Procedures Division  
Alcohol and Tobacco Tax and Trade Bureau  
Attn: Notice No. 41,  
P. O. Box 14412  
Washington, DC 20044-4412

Dear Division Chief:

We are writing our comments in connection with the Division's above request concerning additional disclosure of "Allergen Labeling". Our comments are in the same sequence as the general questions in the aforementioned Notice:

1. We believe that: a) additional study is required to ascertain how the various levels of major food allergens may affect alcohol beverage consumers and b) once that these levels are established, alcohol beverage containers should disclose if they contain "major food allergens required disclosure levels".
2. We believe that even if the product name appearing on the label of an alcohol beverage container indicates that an allergen is present, the alcohol beverage label should properly disclose any "major food allergens" required disclosure level contents in a standardized form; the standard disclosure will confirm to consumers the presence of major food allergens and will hopefully allow consumers to make more intelligent decisions.
3. In regards to certain allergens which are not primary ingredients *used in the* production of alcohol beverages, we recommend that additional studies also be conducted to determine the minimum allowable levels of these allergens used in the production process that would not require labeling disclosure.
4. Same comment as # 3 above.
5. Same comment as # 3 above.
6. Same comment as # 3 above.
7. Same comment as # 3 above.
8. No comment.

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9. No comment.

10. We- hope that consumers will make more informed decisions once the industry provides more information on alcohol beverage labels.

We appreciate the opportunity to submit these comments and look forward to working with the Agency to improve the quality of alcohol beverage labeling requirements.

Sincerely yours,

William L. Eldien  
President